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BY ECF and Mail (Court's Courtesy Copy)  
Honorable Raymond J. Dearie  
Senior United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

February 23, 2015

Re: United States v. Bebars Baslan, 13 CR 220 (RJD)

Dear Judge Dearie:

I have been asked by Bebars Baslan to convey to the Court today by ECF that he has completed his pro se supplemental sentencing submission, but has encountered significant delays in copying and scanning a copy for himself because of the restrictions in access to the MDC library and computer/copying facilities. The submission is quite lengthy, with multiple exhibits. I am on my way to a medical appointment in lieu of my intended visit to him at the MDC today to review the submission with him. Given that no visitors, including legal personnel, are permitted to take documents or materials from an inmate, irrespective of whether they are case-related or thereby expedite the filing process, I have advised Mr. Baslan to mail the submission to the Court today. As a practical matter, that means that the court will not receive the submission until Thursday.

Neither Mr. Baslan nor I seek an adjournment of the sentence. Frankly, I see no benefit to my client whether we proceed on Friday afternoon as scheduled, or whether we put the sentencing off for a few days for convenience of all concerned. I am respectfully submitting this letter to explain that the late filing is not the subject of subterfuge or delaying tactics, but is the product of the restrictive realities of Mr. Baslan's confinement. Mr. Baslan conveys, through this letter, that he is satisfied to continue through the sentencing process with me as his counsel, but will ask for a new court-appointed counsel to represent him on appeal, a choice with which I completely concur and believe is in his best interests in pursuing the appellate points he deems are essential.

This is not another letter request for an adjournment of sentencing. Instead, it is being filed solely to bring to Your honor's attention the difficulties that Mr. Baslan has encountered in preparing and submitting his supplemental sentencing submission, with his apology to the Court for that delay.

I thank Your Honor for your courtesy and consideration.

Respectfully Submitted,

/S/  
Ephraim Savitt

Cc: Clerk of the Court (RJD) (By ECF)  
All Counsel (By ECF)  
Bebars Baslan (By CorrLinks)